

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

United Federation of Churches, LLC (dba
“The Satanic Temple”),

Plaintiff,

v.

David Alan Johnson (aka “ADJ”), Leah
Fishbaugh, Mickey Meeham, and Nathan
Sullivan,

Defendants.

No. 2:20-cv-00509-RAJ

STIPULATED MOTION FOR
LEAVE TO FILE SECOND
AMENDED COMPLAINT

NOTE FOR MOTION CALENDAR:
May 10, 2021

Pursuant to FRCP 15(a)(2) and LCR 15, the parties hereby stipulate and jointly move
for the Court to enter an order granting Plaintiff leave to file a second amended complaint.

I. BACKGROUND AND STIPULATION

On February 26, 2021, the Court entered an Order Granting Defendants’ Motion to
Dismiss. Dkt. # 20. This Order granted Plaintiff leave to file an amended complaint. *Id.* On
March 29, 2021, Plaintiff filed a First Amended Complaint. Dkt. # 22.

Subsequently, the parties met and conferred regarding Defendants’ plan to file a second
motion to dismiss. In order to avoid or limit foreseeable potential complications related to the
planned motion, the parties agreed to permit Plaintiff leave to file a second amended complaint.

1 The parties agree that by consenting to Plaintiff's request to file a second amended complaint,
2 Defendants reserve all defenses, including the right to bring FRCP 12 motion to dismiss the
3 second amended complaint.

4 Pursuant to LCR 15, a proposed second amended complaint indicating the changes from
5 the First Amended Complaint is attached hereto.
6

7 II. CONCLUSION

8 WHEREFORE, the parties respectfully ask the Court to enter an order granting Plaintiff
9 leave to file a second amended complaint.

10 Stipulated and agreed this 10th day of May, 2021.
11

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5 **CERTIFICATE OF SERVICE**

6 I hereby certify that on the 10th day of May, 2021, I electronically filed PLAINTIFF'S
7 MOTION FOR RECONSIDERATION with the Clerk of the Court using the CM/ECF system,
8 which will send notification of such filing to all parties of record.
9

10 Dated at Seattle, Washington, the 10th day of May, 2021.

11 By: /s/ Benjamin Justus
12 Benjamin Justus

13 **CERTIFICATION OF CONFERENCE**

14 The undersigned counsel certifies that, per Paragraph 6 of the Standing Order for Civil Cases
15 Assigned to Judge Richard A. Jones (Doc. 7), on various dates in April 2021, counsel for Plaintiff
16 conferred with counsel for Defendants regarding the foregoing motion.
17

18 Dated at Seattle, Washington, the 10th day of May, 2021.

19 By: /s/ Benjamin Justus
20 Benjamin Justus
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